

Exhibit A

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

-v-

GEORGE ANTHONY DEVOLDER
SANTOS,

Also known as "George Santos"

Defendant.

23-cr-197 (S-1) (JS) (AYS)

**PROPOSED JUROR
QUESTIONNAIRE**

TO THE PROSPECTIVE JUROR:

The information that you give in response to the items in this questionnaire will be used only by the Court and the parties to select a qualified jury and will not be made public. After a jury has been selected, all copies of your questionnaire will be returned to the Clerk of the Court and kept in confidence, under seal. The attorneys are under orders to maintain the confidentiality of any information they learn in the course of reviewing the questionnaire.

Please answer each question as completely and accurately as you can. Your complete written answers will save a great deal of time for the Court, the parties and you. There are no right or wrong answers to the questions. In order to ensure that your answers are not influenced by the opinions of others, you should fill out the questionnaire by yourself without consulting or talking with any other individuals.

You are expected to sign your questionnaire, and your answers will have the effect of a statement given to the Court under oath. What is needed is your very best, honest effort to answer the questions contained in this questionnaire.

If you cannot answer a question because you do not understand it, write "Do not understand" in the space after the question. If you cannot answer because you do not know, write "Do not know" in the space after the question. If you need extra space to answer any question, please use the extra blank sheets of paper included at the end of the questionnaire. Be sure to indicate on the blank page the number of the question you are answering.

I am sure you understand the importance of juries to our American system of justice. I am confident that you also appreciate your duty as a citizen to serve as a juror if you are eligible. Your cooperation in completing and returning this "Juror Questionnaire" is a part of that duty. Without your help our courts cannot operate properly in accordance with the United States Constitution.

The sole purpose of the questionnaire is to encourage your full expression and honesty, so that all parties will have a meaningful opportunity to select a fair and impartial jury to try the issues in this case. Thank you for your full cooperation. It is of vital importance to the Court.

I. Background Information

1. Juror Number: _____ (Please write your assigned juror number on each page of this questionnaire)
2. Age: _____
3. Gender:
☐ Male ☐ Female ☐ They/Them ☐ Other: _____ ☐ Prefer not to say
4. Race/Ethnicity (optional):
☐ White ☐ Black/African American ☐ Hispanic/Latino
☐ Asian ☐ Native American ☐ Other: _____ ☐ Prefer not to say
5. Place of birth: City _____ State/Country _____
6. If not born in the United States, are you a U.S. citizen? ☐ Yes ☐ No
7. What languages do you speak fluently? _____
8. Marital Status:
☐ Single ☐ Married ☐ Divorced ☐ Widowed ☐ Separated ☐ Partnered
9. In what neighborhood of New York do you currently reside? (e.g., Central Islip, East Hampton, etc.) _____
10. How long have you lived at your current residence? _____
11. Do you: ☐ Own your home ☐ Rent ☐ Other: _____
12. Do you have children? ☐ Yes ☐ No
If yes, please list their ages: _____
13. How many people live in your household? _____
14. Please list the occupations of any other adults in your household:

15. What is your highest level of education completed?
☐ Some high school
☐ High school graduate
☐ Some college
☐ Associate's degree
☐ Bachelor's degree
☐ Graduate degree (please specify): _____

16. If you attended college, what was your course of study? _____
17. What is your current employment status?
☐ Employed full-time ☐ Employed part-time ☐ Self-employed
☐ Unemployed ☐ Student ☐ Retired ☐ Homemaker
18. What is your current occupation and employer? (If retired, please state your most recent occupation and employer)
Occupation: _____
Employer: _____
19. How long have you been in this job/position? _____
20. Have you ever served in the military? ☐ Yes ☐ No
If yes, please answer the following:
i. Branch of service: _____
ii. Years of service: _____
iii. Highest rank achieved: _____
iv. Type of discharge: _____
21. Did you ever serve in a military police unit or have any law enforcement duties while in the military? ☐ Yes ☐ No
22. Do you have any close family members who have served or are currently serving in the military? ☐ Yes ☐ No
If yes, please specify their relationship to you and branch of service:

II. Media Exposure and Knowledge of the Case

A. News Consumption

23. Where do you primarily get your news from? (Check all that apply)
☐ Television ☐ Radio ☐ Newspapers ☐ News websites
☐ Social media ☐ Podcasts ☐ Other: _____
24. How often do you follow the news?
☐ Multiple times a day ☐ Daily ☐ Several times a week
☐ Weekly ☐ Rarely ☐ Never
25. Which of the following news sources do you regularly use? (Check all that apply)
☐ CNN ☐ Fox News ☐ MSNBC ☐ ABC ☐ CBS ☐ NBC
☐ New York Times ☐ Wall Street Journal ☐ New York Post
☐ Daily News ☐ Newsday ☐ Washington Post ☐ USA Today
☐ NPR ☐ Reuters ☐ Associated Press ☐ BBC
☐ Other (please specify): _____

26. Of the above news sources, which one do you rely on most?

27. Which social media platforms do you use regularly? (Check all that apply)

- ☐ Facebook ☐ Twitter ☐ Instagram ☐ TikTok ☐ LinkedIn
☐ YouTube ☐ Reddit ☐ Other: _____

What are your names/handles on the platforms you use: _____

B. Familiarity with the Case

28. Have you seen, read, or heard anything about this case involving George Santos?

- ☐ Yes ☐ No ☐ Unsure

29. If yes, where did you hear about it? (Check all that apply)

- ☐ Television news ☐ Newspaper ☐ Radio ☐ Internet news site
☐ Social media ☐ Friends/family ☐ Other: _____

30. What do you recall hearing or reading about this case? Please be specific:

31. Based on what you have heard or read, have you formed any opinion about this case?

- ☐ Yes ☐ No ☐ Unsure

If yes, what is that opinion? _____

32. Have you ever posted anything about this case or George Santos on social media?

- ☐ Yes ☐ No

If yes, please describe the content of your post: _____

C. Knowledge of George Santos

33. Before this questionnaire, were you familiar with George Santos?

- ☐ Yes ☐ No ☐ Unsure

34. If yes, what did you know about him? _____

35. Are you aware of any controversies or allegations involving George Santos?

- ☐ Yes ☐ No ☐ Unsure

If yes, please explain: _____

36. To your knowledge, do any of your relatives, close friends, associates, or employers personally know the defendant?

☐ Yes ☐ No ☐ Unsure

If yes, how do they know the defendant?

37. Did you or anyone you know vote for George Santos as a candidate for political office?

☐ Yes ☐ No ☐ Unsure

38. Did you or anyone you know ever work or volunteer for George Santos' campaign for office?

39. Before today, had you read, seen, or heard anything about the defendant or criminal charges brought against him?

☐ Yes ☐ No ☐ Unsure

40. Have you formed any opinions about George Santos based on what you have seen, heard, or read?

☐ Yes ☐ No ☐ Unsure

If yes, what are those opinions?

41. Do you have any close friends or family members who identify as LGBTQ+?

☐ Yes ☐ No ☐ Prefer not to say

42. How would you describe your general attitude towards LGBTQ+ rights?

☐ Strongly supportive ☐ Somewhat supportive
☐ Neutral ☐ Somewhat opposed ☐ Strongly opposed

D. Exposure to Political News and Commentary

43. How would you rate your level of interest in current political news and events?

☐ Very interested ☐ Somewhat interested ☐ Not very interested ☐ Not at all interested

44. Do you watch or listen to political commentary shows or podcasts?

☐ Yes ☐ No

If yes, which ones? _____

45. Have you ever attended a political rally or campaign event?

☐ Yes ☐ No

If yes, for which candidate(s) or party? _____

46. Have you ever posted or shared political content on social media?

☐ Yes ☐ No

If yes, how often?

☐ Frequently ☐ Occasionally ☐ Rarely

47. Do you follow any politicians or political commentators on social media?

☐ Yes ☐ No

If yes, please list a few: _____

48. Do you believe you can set aside any information you may have heard about this case and decide it solely on the evidence presented in court?

☐ Yes ☐ No ☐ Unsure

Please explain: _____

III. Political Views and Experiences

A. Political Affiliation and Activity

49. How would you describe your political views?

☐ Very conservative ☐ Conservative ☐ Moderate ☐ Liberal ☐ Very liberal

☐ Libertarian ☐ Other: _____ ☐ No political views

50. Are you registered to vote? ☐ Yes ☐ No

If yes, with which party are you registered?

☐ Democratic ☐ Republican ☐ Independent ☐ Other: _____

51. How often do you vote in elections?

☐ Always ☐ Usually ☐ Sometimes ☐ Rarely ☐ Never

52. Have you ever made a financial contribution to a political candidate or party?

☐ Yes ☐ No

If yes, approximately what amount(s) and how often? _____

53. Have you, or has any relative or close friend, ever worked for or had any interactions with any of the following? (Check all that apply)

☐ U.S. House of Representatives Committee on Ethics

☐ New York State Department of Labor

☐ National Republican Congressional Committee

☐ None of the above

If yes, please describe elaborate:

54. Have you ever held or ran for a political office? ☐ Yes ☐ No

If yes, please describe your role: _____

55. Have you ever worked or volunteered for a political campaign? ☐ Yes ☐ No

If yes, please describe your role: _____

56. Have you, or has any relative or close friend, ever worked for a federal elected official?
☐ Yes ☐ No ☐ Unsure

57. Have you, or has any relative or close friend, ever worked or volunteered on a political campaign for elected office?
☐ Yes ☐ No ☐ Unsure

If yes, please describe that work: _____

58. Do you have any political beliefs that might prevent you from being fair and impartial in this case?
☐ Yes ☐ No ☐ Unsure

B. Views on Congress and Politicians

59. How would you rate your overall opinion of the U.S. Congress?
☐ Very favorable ☐ Somewhat favorable ☐ Neutral
☐ Somewhat unfavorable ☐ Very unfavorable

60. Do you believe most members of Congress are:
☐ Honest and trustworthy ☐ Mostly honest with some exceptions
☐ Mostly dishonest with some exceptions ☐ Dishonest and untrustworthy

61. Do you think politicians should be held to a higher ethical standard than the general public?
☐ Yes ☐ No ☐ Unsure
Please explain: _____

62. Do you believe that accusations of misconduct against politicians are usually:
☐ True and substantiated ☐ Sometimes true, sometimes false
☐ Often exaggerated ☐ Usually false or politically motivated

IV. Law Enforcement and Legal System

63. Have you ever had any direct interactions with law enforcement officers?
☐ Yes ☐ No
If yes, please describe the nature of these interactions: _____

64. How would you rate your overall opinion of law enforcement?

- ☐ Very positive ☐ Somewhat positive ☐ Neutral
☐ Somewhat negative ☐ Very negative

65. Have you ever been a victim of a crime? ☐ Yes ☐ No

If yes, was the crime reported to law enforcement? ☐ Yes ☐ No

Were you satisfied with how law enforcement handled the situation?

- ☐ Yes ☐ No ☐ Somewhat

Please explain: _____

Please describe the circumstances, including the type of crime, when it happened, and the outcome of any law enforcement action:

66. Do you have any opinion about the enforcement of federal laws that might prevent you from being fair and impartial in this case?

- ☐ Yes ☐ No ☐ Unsure

67. Regarding law enforcement witnesses, would you be:

- ☐ More likely to believe their testimony
☐ Less likely to believe their testimony
☐ Neither more nor less likely to believe their testimony

Please explain your answer:

68. Do you believe that the crimes charged in the indictment, as described to you, should not be illegal or that such law should not be enforced or prosecuted by the United States government?

- ☐ Yes ☐ No ☐ Unsure

69. Do you have strong views regarding whether the United States Department of Justice should or should not pursue charges against candidates for elected office?

- ☐ Yes ☐ No ☐ Unsure

If yes, please describe those views:

70. Has anyone in your family or close circle of friends ever worked in law enforcement or the legal system? ☐ Yes ☐ No

If yes, please specify their relationship to you and their role: _____

71. Have you or anyone close to you ever been arrested or charged with a crime?

☐ Yes ☐ No

If yes, how did this experience affect your view of the legal system? _____

72. Have you ever sat as a juror or grand juror before in any type of case?

☐ Yes ☐ No

If yes, please provide the following information:

Type of court: ☐ State ☐ Federal

Type of case: ☐ Civil ☐ Criminal

Was a verdict reached? ☐ Yes ☐ No

Please indicate where and when you served, and describe, in general terms, the kind of case(s) you heard:

73. If you have prior jury experience, is there anything about those experiences that would prevent you from acting as a fair and impartial juror in this case?

☐ Yes ☐ No ☐ Unsure

If yes, please explain:

74. Have you, or has any relative or close friend, ever worked in law, law enforcement, the justice system, or the courts?

☐ Yes ☐ No ☐ Unsure

If yes, in what capacity?

Will this influence your ability to render a fair and impartial verdict in this case

75. Have you had any contact with anyone in law, law enforcement, the justice system or the courts that might influence your ability to render a fair and impartial verdict in this case?

☐ Yes ☐ No ☐ Unsure

If yes, please explain:

76. Have you developed any bias, prejudice, or other feelings for or against any of the following? (Check all that apply)

☐ United States Department of Justice

- ☐ United States Attorney's Office for the Eastern District of New York
- ☐ Federal Bureau of Investigation
- ☐ Other law enforcement agency
- ☐ None of the above

If checked any, please explain:

77. Do you or any of your relatives or close friends work for a criminal defense lawyer or investigator, or have worked for such a person in the past?

- ☐ Yes ☐ No ☐ Unsure

78. Do you have any opinions about prosecutors or criminal defense attorneys generally that might make it difficult for you to be a fair and impartial juror in this case?

- ☐ Yes ☐ No ☐ Unsure

If yes, please explain:

79. Have you, or has any relative or close friend, ever participated in a state or federal court case, whether criminal or civil, as a witness, plaintiff, or defendant?

- ☐ Yes ☐ No ☐ Unsure

If yes, what kind of case and what was your role?

80. Have you, or has any relative or close friend, ever been the subject of any criminal investigation or accusation by any grand jury, state or federal, or any other investigation?

- ☐ Yes ☐ No ☐ Unsure

81. Have you, or has any relative or close friend – either as an individual or in the course of business – ever been a party to a legal action or dispute with the United States, or with any of its offices, departments, agencies, or employees?

- ☐ Yes ☐ No ☐ Unsure

82. Have you had any legal, financial, or other interest in any such legal action or dispute or its outcome?

- ☐ Yes ☐ No ☐ Unsure

83. Have you, or has any relative, ever had a dispute concerning money owed to you by the government or owed by you to the government?

- ☐ Yes ☐ No ☐ Unsure

V. Experiences Related to the Allegations in the Indictment

84. Have you or anyone close to you ever been a victim of financial fraud, identity theft, or other financial deception?

☐ Yes ☐ No

If yes, please describe the experience without providing specific details:

85. Have you or anyone you know ever applied for unemployment insurance benefits?

☐ Yes ☐ No

If yes, was such application in connection with the COVID-19 Pandemic?

☐ Yes ☐ No

86. How would you rate your knowledge of campaign finance laws?

☐ Very knowledgeable ☐ Somewhat knowledgeable

☐ Not very knowledgeable ☐ No knowledge

87. Are you familiar with the term "FEC" (Federal Election Commission)?

☐ Yes ☐ No

If yes, what do you understand its role to be? _____

88. To the best of your knowledge, are there limits on how much an individual can contribute to a political campaign? ☐ Yes ☐ No ☐ Unsure

If yes, what do you believe these limits to be? _____

89. Are you familiar with the concept of "Super PACs"? ☐ Yes ☐ No

If yes, what is your understanding of how they operate? _____

90. Have you, or has any relative or close friend, ever worked for, volunteered for, or contributed funds to a Section 501(c)(4) social welfare organization or an independent expenditure-only committee (also known as a "Super PAC")?

☐ Yes ☐ No ☐ Unsure

If yes, please elaborate:

91. Do you have any opinions about current campaign finance laws?

☐ Yes ☐ No

If yes, please explain: _____

92. Are you familiar with the process of reporting political contributions?

☐ Yes ☐ No ☐ Somewhat

If yes or somewhat, what is your understanding of this process? _____

93. Have you, or has any relative or close friend, had any experiences of any kind, directly or indirectly, with unemployment insurance benefits fraud, credit card fraud, identity theft, or fraud generally?

If yes, please explain:

94. Have you, or a close relative or friend, ever been accused of or investigated for any type of fraud?

☐ Yes ☐ No

If yes, please explain the circumstances without providing specific details:

95. In your work or personal life, have you ever been responsible for detecting or preventing fraud?

☐ Yes ☐ No

If yes, please describe your role: _____

VI. Ability to Serve

A. Time Commitment and Availability

96. This trial is expected to last approximately 4-6 weeks. Are you able to serve for this duration?

☐ Yes ☐ No ☐ Unsure

If no or unsure, please explain: _____

97. Do you have any personal commitments that would make it difficult for you to get to court by at least 9:30 a.m. every day of trial, or remain at the courthouse until 5:00 p.m.?

☐ Yes ☐ No ☐ Unsure

If no or unsure, please explain: _____

98. Do you have any pre-planned commitments during the next 6 weeks that cannot be rescheduled? (e.g., medical procedures, important family events, pre-paid travel)

☐ Yes ☐ No

If yes, please describe (without providing specific dates): _____

99. Would serving on this jury create any undue financial hardship for you?

☐ Yes ☐ No

If yes, please explain: _____

100. Does your employer pay you for jury duty?

☐ Yes ☐ No ☐ I am not currently employed

If no, would this create a hardship for you? ☐ Yes ☐ No

101. Do you have any caregiving responsibilities that might interfere with your ability to serve?

☐ Yes ☐ No

If yes, please explain: _____

B. Physical or Mental Health Considerations

102. Do you have any physical health issues that might affect your ability to serve as a juror? (e.g., difficulty sitting for long periods, hearing problems)

☐ Yes ☐ No

If yes, please explain: _____

103. Do you have any mental health issues that might affect your ability to serve as a juror? (e.g., anxiety, difficulty concentrating)

☐ Yes ☐ No

If yes, please explain: _____

104. Are you currently taking any medications that might affect your ability to concentrate or stay alert during trial proceedings?

☐ Yes ☐ No

If yes, please explain (without naming specific medications): _____

105. Do you have any concerns about your ability to handle the stress of serving on a jury in a high-profile case?

☐ Yes ☐ No

If yes, please explain: _____

C. Language Proficiency

106. Is English your first language?

☐ Yes ☐ No

If no, what is your first language? _____

107. Do you have any difficulty reading, writing, or understanding English?

☐ Yes ☐ No

If yes, please explain: _____

108. Would you feel comfortable deliberating in English with other jurors?
☐ Yes ☐ No ☐ Unsure
109. Do you think you would need any language accommodations to serve effectively as a juror?
☐ Yes ☐ No
If yes, what kind of accommodations? _____

D. Ability to Follow Legal Instructions

110. The law requires that jurors must presume the defendant innocent unless the government proves guilt beyond a reasonable doubt. Do you have any hesitation about following this instruction?
☐ Yes ☐ No
If yes, please explain: _____
111. Can you commit to basing your verdict solely on the evidence presented in court and the judge's instructions on the law, rather than on any outside information or personal beliefs?
☐ Yes ☐ No ☐ Unsure
Please explain: _____
112. Would you have any difficulty following a legal instruction from the judge even if you personally disagreed with it?
☐ Yes ☐ No ☐ Unsure
Please explain: _____
113. Do you understand that the burden of proof is on the government and that the defendant is not required to present any evidence or testify?
☐ Yes ☐ No
114. If the defendant chooses not to testify, would you hold that against him in any way?
☐ Yes ☐ No ☐ Unsure
Please explain: _____
115. Can you commit to not discussing the case with anyone, including family and friends, and to avoiding all media coverage of the case during the trial?
☐ Yes ☐ No ☐ Unsure
If no or unsure, please explain: _____
116. Do you have any concerns about your ability to be a fair and impartial juror in this case?
☐ Yes ☐ No
If yes, please explain: _____

117. Is there any other reason, not covered in this questionnaire, that might affect your ability to serve as a fair and impartial juror in this case?

☐ Yes ☐ No

If yes, please explain: _____

VII. Juror Rights and Responsibilities

118. Do you understand that as a juror, you would be:

a) A judge of the facts presented in evidence?

☐ Yes ☐ No

b) Required to apply the law as instructed by the judge, even if you disagree with it?

☐ Yes ☐ No

119. Do you have any concerns about your ability to fulfill the responsibilities of a juror? ☐ Yes ☐ No

If yes, please explain: _____

120. Do you understand that sympathy, bias, and prejudice should not play any part in your deliberations as a juror? ☐ Yes ☐ No

121. Do you understand that the defendant is presumed innocent until proven guilty beyond a reasonable doubt?

☐ Yes ☐ No

122. Do you have any hesitation about applying the presumption of innocence in this case?

☐ Yes ☐ No

If yes, please explain: _____

123. Do you understand that the burden of proof is always on the government and never shifts to the defendant?

☐ Yes ☐ No

124. If, after hearing all the evidence, you had a reasonable doubt about the defendant's guilt, would you be able to find him not guilty?

☐ Yes ☐ No ☐ Unsure

Please explain: _____

125. Do you understand that the Indictment is not evidence of guilt, but merely a formal accusation?

☐ Yes ☐ No

126. Do you understand that the defendant has no obligation to testify or present any evidence in his defense?

☐ Yes ☐ No

127. If the defendant chooses not to testify, would you be able to follow the judge's instruction not to hold that against him in any way?

☐ Yes ☐ No ☐ Unsure

Please explain: _____

128. Are you willing to keep an open mind throughout the trial and reserve judgment until you have heard all the evidence and the judge's instructions on the law?

☐ Yes ☐ No ☐ Unsure

Please explain: _____

129. Do you accept that a defendant:

a) Need not present any evidence at all?

☐ Yes ☐ No ☐ Unsure

b) Is not required to testify on his own behalf?

☐ Yes ☐ No ☐ Unsure

c) Is presumed innocent unless the government proves an allegation beyond a reasonable doubt?

☐ Yes ☐ No ☐ Unsure

If you answered No or Unsure to any of the above, please explain:

130. Do you have any difficulty accepting that the jury's role is to decide questions of fact, while taking instructions on the law from the Court?

☐ Yes ☐ No ☐ Unsure

If yes, please explain:

131. Would you have any hesitation or reservation about following the law as explained by the Court, even if you disagree with the law?

☐ Yes ☐ No ☐ Unsure

If yes, please explain:

132. Do you accept that the question of punishment is for the Court alone to decide and must not enter into your deliberations?

☐ Yes ☐ No ☐ Unsure

133. Do you accept that sympathy or empathy must not enter into your deliberations, and that only the evidence presented in court may be used to determine guilt?
☐ Yes ☐ No ☐ Unsure

134. If the evidence established a defendant's guilt beyond a reasonable doubt, would you be able to render a guilty verdict?
☐ Yes ☐ No ☐ Unsure

If no or unsure, please explain:

VIII. Additional Information

A. Any Other Relevant Information

135. Is there anything else you believe the Court should know about you that might be relevant to your service as a juror in this case?
☐ Yes ☐ No

If yes, please explain: _____

136. Are there any topics or issues not covered in this questionnaire that you think might affect your ability to be a fair and impartial juror in this case?

☐ Yes ☐ No

If yes, please explain: _____

B. Questions or Concerns for the Court

137. Do you have any questions about jury service or this case that you would like to ask the Court?

☐ Yes ☐ No

If yes, please list your questions: _____

Certification

I declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge and belief. I understand that if I have intentionally provided false information in this questionnaire, I may be subject to penalties for perjury.

Juror Number: _____

Date: _____

Signature: _____